

REMARKS/ARGUMENTS

Favorable reconsideration of the present application is respectfully requested.

Claim 1 has been amended to recite means for pressing the inside of the green tire.

Basis for this can be found in Figures 15(a) and 15(b), and on page 39 of the specification.

Claim 4 has been rewritten in independent form, except that unnecessary limitations from the intervening Claim 2 have not been included. In addition, Claim 3 has been rewritten in independent form and is believed to be allowable for the reasons set forth below. Claims 13-19 have been withdrawn from consideration. New dependent Claim 20 has been introduced.

Claims 1-12 and 20 are active in the application.

The specification has been amended in response to the objection to the drawings found in paragraph 4 of the Office Action, which objection is now believed to be moot. Additionally, the abstract has been revised as required in paragraph 5 of the Office Action, and claims 3 and 4 have been amended in response to paragraphs 6 and 8 of the Office Action.

Concerning the rejection of claims 1-3 under 35 U.S.C. § 102 in paragraph 10 of the Office Action, it is noted that U.S. patent 6,655,940 (Mitamura et al) was filed on July 13, 2001 and published on Feb. 7, 2002, both of which dates are subsequent to the July 12, 2001 U.S. filing date of the present application. Accordingly, this reference is not prior art with respect to the present application.

Claims 1-3 and 9 stand rejected under 35 U.S.C. § 103 as being obvious over DE '082. Claim 3 has been rewritten in independent form and has been corrected to recite that the local heating coil forms a high frequency magnetic field along a portion of peripheral direction of a wire-ring-shaped metal member embedded in a bead portion of said green tire. Claim 3 is believed to define over DE '082 since DE '082 lacks any disclosure of a wire ring shaped metal member embedded in a *bead* portion of the green tire. Indeed, the metal

member 24 upon which the Examiner has relied is located in a tread – not bead – portion of the tire.

Claim 1 has been amended to further recite pressing means for pressing the inside of the green tire. An example of the pressing means is the pressing means 214 shown in Figure 15(a)-(b). No such pressing means is taught in DE '082.

The remaining claims have been withdrawn or depend from the above claims, and so the claims are believed to define over the prior art.

Applicants therefore believe that the present application is in a condition for allowance and respectfully solicit an early Notice of Allowability.

Respectfully submitted,

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